

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA §
§
vs. § NO. 3:10-CR-073-K
§
TITO MILLER PARRA-ISAZA §

DEFENDANT'S MOTION FOR EXTENSION OF PRE-TRIAL MOTIONS DEADLINE AND
TRIAL

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Defendant Tito Miller Parra-Isaza by and through his attorney of record, Hugo Aguilar, and files this motion and in support would respectfully show the Court the following:

I.

The deadline for filing Pre-Trial Motions was set for March 25, 2015 and the responses were by due April 8, 2015. The trial is set for May 4, 2015.

II.

Counsel is requesting that a new deadline be set for motions and responses and that the trial be continued to a later date. Counsel for defendant needs additional time to review discovery and due to the nature of this case needs additional time to prepare for any potential trial. Therefore, we ask that the Court issue a revised scheduling order and continue the trial for a later date.

III.

Counsel on behalf of Defendant waives any claim under the Speedy Trial Act of the United States and Code and the Constitution of the United States. Furthermore, this motion is not made for the purpose of delay but so that justice may be served. Wherefore, premises

considered Defendants prays that this Court grant this Motion and Extend the Filing Deadlines and set a new date for sentencing.

Respectfully submitted,

/ Hugo Aguilar

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Certificate of Conference

I hereby certify that I discussed this matter with Nicole Grosnoff, the Assistant United States Attorney assigned to this case, on April 15, 2015, and she is not opposed to the Defendant's request.

/ Hugo Aguilar

Hugo Aguilar

Certificate of Service

I hereby certify that on April 17, 2015 a true and correct copy of the above Motion was filed with the Court, and through that system, all parties, by and through their respective attorneys, including Nicole Grosnoff, the Assistant United States Attorney handling this case have had this Motion forwarded to them.

/ Hugo Aguilar

Hugo Aguilar